

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>CHICAGO &amp; VICINITY LABORERS' et al.</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>Case No. 23 C 3848</b>
<b>v.</b>	)	
	)	<b>Judge: GETTLEMAN</b>
<b>EMERGIA INC., an Illinois corporation,</b>	)	
	)	
<b>Defendant.</b>	)	

**PARTIES AGREED STIPULATION OF JUDGMENT**

NOW COMES, Plaintiffs Chicago & Vicinity Laborers' District Council Pension Fund, Chicago & Vicinity Laborers' District Council Welfare Fund, Chicago & Vicinity Laborers' District Council Retiree Health & Welfare Fund, and Catherine Wenskus, not individually, but as Administrator of the Funds, (collectively herein the "Funds"), by and through their attorney, Patrick T. Wallace, and Defendant Emergia, Inc. ("Company") by through its attorney, Todd A. Miller of the firm of Allocco, Miller & Cahill, and hereby submit the Parties' Agreed Stipulation of Judgment ("Stipulation"). In support of this Stipulation, the Parties state as follows:

1. The Parties hereby agree and stipulate that the judgment shall be in favor of the Plaintiffs Funds and the Company in the amount of \$175,842.83 as follows:
  - a. \$62,214.41 on the audit for the period of June 1, 2022 through June 30, 2023;
  - b. \$10,908.64 on the audit for the period of July 1, 2023 through March 31, 2025;
  - c. \$83,421.25 in accumulated liquidated damages on late-paid benefit reports for the period of August 2022 through December 2024;
  - d. \$3,665.53 in accumulated liquidated damages due on late-paid dues reports

for the period of August 2022 through September 2024; and

e. \$15,633.00 in the Funds' attorneys' fees and costs.

3. The parties further stipulate that the Company shall be ordered to pay post-judgment interest in all amounts due from the date of the judgment until the judgment is satisfied.

WHEREFORE, the parties respectfully request that the Court enter judgment in favor of the Plaintiffs and against the Company in the amount of \$175,842.83 and that the Company be ordered to pay post-judgment interest in all amounts due from the date of judgment until the date the judgment is satisfied.

December 29, 2025

Respectfully submitted,

Chicago & Vicinity Laborers' et al.

Emergia, Inc.

/s/ Patrick T. Wallace  
Attorney for Plaintiffs

/s/ Todd A. Miller  
Attorney for Defendant

Chicago & Vicinity Laborers'  
11465 Cermak Rd.  
Westchester, IL 60154

Allocco Miller & Cahill, P.C.  
20 N. Wacker Drive, Suite 3517  
Chicago, IL 60606

**CERTIFICATE OF SERVICE**

The undersigned certifies that she caused copies of the foregoing Agreed Stipulation of Judgment upon the following persons via the Court's electronic notification system on this 29<sup>th</sup> day of December, 2025.

Todd A Miller  
Allocco Miller & Cahill, P.C.  
20 N. Wacker Drive, Suite 3517  
Chicago, IL 60606

/s/ Patrick T. Wallace